



ATTACHMENT 13 – URBAN WATER SUPPLIER ELIGIBILITY

****NOTE** Compliance Forms have been submitted early at the request of DWR; forms were submitted to the Department on December 31, 2010.**

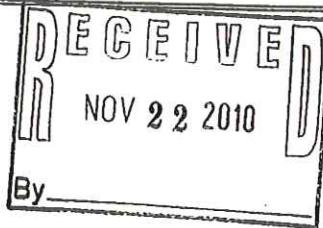
Castaic Lake Water Agency (CLWA or Agency) is the applicant and an Urban Water Supplier that will be receiving funding from this Implementation Grant should the Proposal be awarded funding. The Agency submitted to DWR its self certification forms for documenting compliance with Assembly Bill (AB) 1420 for Best Management Practice and California Water Code (CWC) §525 for Water Meter Installation with the Upper Santa Clara River IRWM Plan Proposition 84 Round 1 Planning Grant Application on September 28, 2010. The attached documentation provided as Att13_IG1_UrbanSupplier_2of2 is DWR's compliance letter, dated November 9, 2010, which provides DWR's review and acceptance of the Agency's conformance with AB 1420.

Newhall County Water District (NCWD) is also an Urban Water Supplier that will be receiving funding from this Implementation Grant should the Proposal be awarded funding. NCWD is the project sponsor for the Santa Clara River-Sewer Trunk Line Relocation Project. As such, self certification forms for documenting compliance with CWC §525 for Water Meter Installation and AB 1420 for Best Management Practice implementation are provided as Att13_IG1_UrbanSupplier_2of2.

Valencia Water Company (VWC) is also an Urban Water Supplier that will be receiving funding from this Implementation Grant should the Proposal be awarded funding. VWC is the project sponsor for the Santa Clarita Valley Southern End Recycled Water Project. As such, self certification forms for documenting compliance with CWC §525 for Water Meter Installation and AB 1420 for Best Management Practice implementation are provided as Att13_IG1_UrbanSupplier_2of2.

DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791



November 9, 2010

Mr. Dirk Marks, Water Resources Manager
Castaic Lake Water Agency
27234 Bouquet Canyon Road
Santa Clarita, California 91350-2173

Dear Mr. Marks:

The Department of Water Resources (DWR) has reviewed the Castaic Lake Water Agency's (CLWA) Self-Certification Statement – Table 1 dated October 26, 2010, regarding implementation of the Urban Best Management Practices (BMPs).

The purpose of DWR's review is to determine eligibility of CLWA to receive water management grant or loan funds. DWR has followed the *Draft AB 1420 Compliance Requirements* dated June 1, 2009. For detailed information, please visit <http://www.water.ca.gov/wateruseefficiency/finance/>.

Based on DWR's review of the information in Table 1, CLWA has and is currently implementing the BMPs consistent with AB 1420 and, therefore, is eligible to receive water management grant or loan funds.

DWR reserves the right to request additional information and documentation, including reports from CLWA to substantiate the accuracy of the information provided in Table 1. DWR may reverse or modify its eligibility determination and notify you and the funding agency if inaccuracies are found in the supporting documentation or in Table 1.

If you have any questions, please contact me at (916) 651-7025 or Jodi Evans at (916) 651-7026.

Sincerely,

A handwritten signature in black ink, appearing to read "Fethi BenJemaa".

Fethi BenJemaa
Ag Water Use Efficiency Section Chief

California State Water Resources Control Board
California Department of Water Resources
California Department of Public Health



**CERTIFICATION FOR
COMPLIANCE WITH WATER METERING REQUIREMENTS
FOR FUNDING APPLICATIONS**

Funding Agency name: CALIFORNIA DEPARTMENT OF WATER RESOURCES

Funding Program name: PROPOSITION 84 IRWM

Applicant (Agency name): NEWHALL COUNTY WATER DISTRICT

Project Title (as shown on application form): SANTA CLARA RIVER SEWER
TRUNK LINE RELOCATION "PHASE 1"

Please check one of the boxes below and sign and date this form.

As the authorized representative for the applicant agency, I certify under penalty of perjury under the laws of the State of California, that the agency is not an urban water supplier, as that term is understood pursuant to the provisions of section 529.5 of the Water Code.

As the authorized representative for the applicant agency, I certify under penalty of perjury under the laws of the State of California, that the applicant agency has fully complied with the provisions of Division 1, Chapter 8, Article 3.5 of the California Water Code (sections 525 through 529.7 inclusive) and that ordinances, rules, or regulations have been duly adopted and are in effect as of this date.

I understand that the Funding Agency will rely on this signed certification in order to approve funding and that false and/or inaccurate representations in this Certification Statement may result in loss of all funds awarded to the applicant for its project. Additionally, for the aforementioned reasons, the Funding Agency may withhold disbursement of project funds, and/or pursue any other applicable legal remedy.

Steve Cole

Name of Authorized Representative
(Please print)

G.M.

Title

SJM

Signature

11-24-10

Date

AB 1420 Self-Certification Statement Table 1

Note: Table 1 documents Status of Past and Current BMP implementation.

Self-Certification Statement: The Urban Water Supplier and its authorized representative certifies, under penalty of perjury, that all information and claims, stated in this table, regarding compliance and implementation of the BMPs, including alternative conservation approaches, are true and accurate. This signed AB 1420 Self-Certification Statement Table 1, and Table 2 are the basis for granting funds by the Funding Agency. Falsification and/or inaccuracies in AB 1420 Self Certification Statement Table 1, and Table 2 and in any supporting documents substantiating such claims may, at the discretion of the funding agency, result in loss of all State funds to the applicant. Additionally, the Funding Agency, in its sole discretion, may halt disbursement of grant or loan funds, not pay pending invoices, and/or pursue any other applicable legal remedy and refer the matter to the Attorney General's Office.

Name of Signatory Stephen L Cole Title of Signatory General Manager Signature of signatory _____

Date 11/23/10

C1	C2	C3	C4	C5	*C6	C7	**C8	**C9	**C10	C11	C12	C13	C14	C15	C16	C17	C18			
BMP Implemented by Retailers and/or Wholesalers / BMP				Compliance Options/Alternative Conservation Approaches (1)				BMP Is Exempt (2)		BMP Implementation Requirements Met										
BMPs required for Wholesale Supplier	BMPs required for Retail Supplier	Retailer Wholesaler Yes/No	Wholesaler Yes/No	Regional	BMP Checklist	BMP Flex Track	Gallons Per Capita Per Day GPCD	Not Cost Effective	Lack of Funding	CUWCC MOU Requirement Met: Retailer Yes/No	Date of BMP Report Submitted to CUWCC for (2007-2008) Signatories (3)	CUWCC MOU Requirement Met: Wholesaler Yes/No	Date BMP Implementation Data Submitted to DWR in CUWCC Format (Non MOU Signatories) (3)	All Supporting Documents have been Submitted Yes/No						
✓	BMPs	✓	✓	✓	✓	✓				No				Yes		12/30/2008		Yes		
✓	BMP 5 Large Landscape Conservation Programs and Incentives									Yes										
✓	BMP 6 High-Efficiency Washing Machine Rebate Programs									No									Yes	
✓	BMP 7 Public Information	✓	✓	✓						Yes				Yes		12/30/2008		Yes		
✓	BMP 8 School Education	✓	✓	✓						Yes				Yes		12/30/2008		Yes		
✓	BMP 9 Conservation programs for Commercial, Industrial, and Institutional (CII) Accounts	✓	✓	✓						Yes										
✓	BMP 10 Wholesale Agency Assistance Programs		✓							Yes				Yes		12/30/2008		Yes		
✓	BMP 11 Conservation Pricing	✓								Yes				Yes		12/30/2008		Yes		
✓	BMP 12 Conservation Coordinator	✓	✓							Yes				Yes		12/30/2008		Yes		
✓	BMP 13 Water Waste Prohibitions	✓								Yes				Yes		12/30/2008		Yes		
✓	BMP 14 Residential ULFT Replacement Programs	✓	✓							Yes				Yes		12/30/2008		Yes		

*C6: Wholesaler may also be a retailer (supplying water to end water users)

**C8, **C9, **C10: Agencies choosing an alternative conservation approach are responsible for achieving water savings equal or greater than that which they would have achieved using only BMP list.

(1) For details, please see: <http://www.cuwcc.org/mou/exhibit-1-bmp-definitions-schedules-requirements.aspx>.

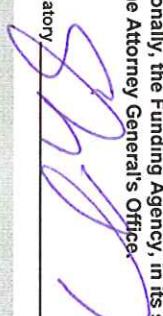
(2) BMP is exempt based on cost-effectiveness, lack of funding, and lack of legal authority criteria as detailed in the CUWCC MOU

(3) Non MOU signatories must submit to DWR reports and supporting documents in the same format as CUWCC.

AB 1420 Self-Certification Statement Table 2

Provide Schedule, Budget, and Finance Plan to Demonstrate Commitment to Implement All BMP's to Become in Compliance with BMP Implementation - Commencing Within 1st Year of Agreement for Which Applicant Receives Funds.

Self-Certification Statement: The Urban Water Supplier and its authorized representative certifies, under penalty of perjury, that all information and claims, stated in this table, regarding compliance and implementation of the BMPs, including alternative conservation approaches, are true and accurate. This signed AB 1420 Self-Certification Statement Table 1 and Table 2 are the basis for granting funds by the Funding Agency. Falsification and/or inaccuracies in AB 1420 Self Certification Statement Table 1 and Table 2, and in any supporting documents substantiating such claims may, at the discretion of the funding agency, result in loss of all State funds to the applicant. Additionally, the Funding Agency, in its sole discretion, may halt disbursement of grant or loan funds, not pay pending invoices, and/or pursue any other applicable legal remedy and refer the matter to the Attorney General's Office.

Name of Signatory Stephen L Cole Title of Signatory General Manager Signature of signatory  Date 11/23/10

Application Date: 11/23/2010

Proposal Identification Number:

Applicant Name:

Project Title: Santa Clara River Sewer Trunk Line Relocation "Phase 1"

Applicant's Contact Information:

Name Michael Alvord

Participants:

Retailer (List Below)

Is the UWM Plan Deemed Complete by DWR?

Yes

No

Submitting 2010

C1 C2 C3 C4 C5 *C6 C7 C8 **C9 **C10 **C11 C12 C13 C14 C15 C16 C17 C18 C19

CUWCC 2010 Flex Track BMPs Supplier	BMPs required for Retail Wholesale BMPs	BMP Implemented by Retailers and/or Wholesalers	Alternative Conservation Approaches (1)	Compliance Options / Alternative Conservation Approaches (1)	BMP is Exempt (2)	Implementation Scheduled to Commence within 1st Year of Agreement													
						Retailer	Wholesaler	Regional Approaches	Yes/No	Checklist	BMP Per Day	Gallons Per Capita Per Day	Funding Source & Finance Plan to Meet CUWCC 1420 Compli Table 3) Yes/No	Start Date	Completion Level	BMP Completion (%)	Date (MM/YR)	Budget (Dollars)	Implement BMPs
1. Utility Operations Programs																			
1.11		BMP 12 Conservation																	
1.12		BMP 13 Water Waste Prohibitions																	
1.13		BMP 10 Wholesale Agency Assistance Programs																	
1.20		BMP 3 System Water Audits, Leak Detection/Repair																	
1.30		BMP 4 Metering with Commodity Rates for All New/Retrofit of Existing connections																	
1.40		BMP 11 Conservation Pricing																	
2. Educational Programs																			
2.10		BMP 7 Public Information																	
2.20		BMP 8 School Education																	
3. Residential																			
3.11	✓	BMP 1 Indoor Water Survey for Single/Multi-Family Residential Customers	Yes	No	Yes	✓						Jul-11	90%	Jun-13	\$2,500.00	Water Rates	Yes		
3.12	✓	BMP 1 Outdoor Water Survey for Single/Multi-Family Residential Customers	Yes	No	Yes	✓						Jul-11	90%	Jun-13	\$2,500.00	Water Rates	Yes		
3.20	✓	BMP 2 Residential Plumbing Retrofit	Yes	No	Yes	✓						Jul-11	50%	Jun-15	\$6,000.00	Water Rates	Yes		

Implementation Scheduled to Commence within 1st Year of Agreement												
BMP Implemented by Retailers and/or Wholesalers			Compliance Options / Alternative Conservation Approaches (1)			BMP is Exempt (2)						
CUWCC 2010 Flex Track BMPs	BMPs required for Wholesale Supplier	BMPs required for Retailer Supplier	Retailer Yes/No	Wholesaler Yes/No	Regional Conservation Approaches Yes/No	Alternative Conservation Approaches Yes/No	BMP Checklist	Flex Track	Gallons Per Capita Per Day	Not Cost Effective	Funding Source & Finance Plan to Implement BMPs	Funds Requested if Available, (See AB Table 3) Yes/No
3.30	✓	BMP 6 High-Efficiency Washing Machine Rebate Programs	Yes	No	Yes	✓			Lack of Funding Lack of Legal Authority	Start Date (MM/YY)	BMP Completion Date (MM/YY)	Budget (Dollars)
3.40		BMP 14 Residential ULFT Replacement Programs							Jul-11	0%	Jun-17	\$18,000.00
4. Commercial, Industrial, Institutional												
4.00		BMP 9 Conservation programs for Commercial, Industrial, and Institutional (CII) Accounts										
5.00		BMP 5 Large Landscape Conservation Programs and Incentives										

*6: Wholesaler may also be a retailer (supplying water to end water users)

**C9, ** C10, and **C11: Agencies choosing an alternative conservation approach are responsible for achieving water savings equal or greater than that which they would have achieved using only BMP 1st.

(1) For details, please see <http://www.cuwcc.org/module/exhibit-1-bmp-definitions-schedule-&requirements.aspx>.

(2) BMP is exempt based on cost-effectiveness, lack of funding, or lack of legal authority, as detailed in the CUWCC MOU.

California State Water Resources Control Board
California Department of Water Resources
California Department of Public Health



**CERTIFICATION FOR
COMPLIANCE WITH WATER METERING REQUIREMENTS
FOR FUNDING APPLICATIONS**

Funding Agency name: DEPARTMENT OF WATER RESOURCES (DWR)

Funding Program name: IRWM GRANTS

Applicant (Agency name): VALENCIA WATER COMPANY (VWC)

Project Title (as shown on application form): SOUTH END RECYCLED WATER PROJECT

Please check one of the boxes below and sign and date this form.

- As the authorized representative for the applicant agency, I certify under penalty of perjury under the laws of the State of California, that the agency is not an urban water supplier, as that term is understood pursuant to the provisions of section 529.5 of the Water Code.
- As the authorized representative for the applicant agency, I certify under penalty of perjury under the laws of the State of California, that the applicant agency has fully complied with the provisions of Division 1, Chapter 8, Article 3.5 of the California Water Code (sections 525 through 529.7 inclusive) and that ordinances, rules, or regulations have been duly adopted and are in effect as of this date.

I understand that the Funding Agency will rely on this signed certification in order to approve funding and that false and/or inaccurate representations in this Certification Statement may result in loss of all funds awarded to the applicant for its project. Additionally, for the aforementioned reasons, the Funding Agency may withhold disbursement of project funds, and/or pursue any other applicable legal remedy.

KEITH ABERCROMBIE

Name of Authorized Representative
(Please print)

GENERAL MANAGER

Title

Keith Abercrombie

Signature

12/17/10

Date

AB 1420 Self-Certification Statement Table 1

Note: Table 1 documents Status of Past and Current BMP implementation.

Self-Certification Statement: The Urban Water Supplier and its authorized representative certifies, under penalty of perjury, that all information and claims, stated in this table, regarding compliance and implementation of the BMPs, including alternative conservation approaches, are true and accurate. This signed AB 1420 Self-Certification Statement Table 1, and Table 2 are the basis for granting funds by the Funding Agency. Falsification and/or inaccuracies in AB 1420 Self Certification Statement Table 1, and Table 2 and in any supporting documents substantiating such claims may, at the discretion of the funding agency, result in loss of all State funds to the applicant. Additionally, the Funding Agency, in its sole discretion, may halt disbursement of grant or loan funds, not pay pending invoices, and/or pursue any other applicable legal remedy and refer the matter to the Attorney General's Office.

Name of Signatory_Matthew S. Dickens_____ Title of Signatory Resource Conservation Manager_____
Signature of signatory  Date 12/21/200

Application Date:		<input type="text"/>	CUWCC Member?	Yes/No	<input checked="" type="checkbox"/> Yes	Is the UWM Plan Deemed Complete by DWR? Yes/No										
Proposal Identification Number:		<input type="text"/>	Has Urban Water Supplier submitted a 2005 Urban Water Management Plan? Yes/No		<input checked="" type="checkbox"/> Yes											
Applicant Name:		<input type="text"/> Castaic Lake Water Agency														
Project Title:		<input type="text"/> Matthew S. Dickens		Phone:	<input type="text"/> 661-295-6543	E-mail:	<input type="text"/> mdickens@valenciacawater.com									
Participants:		<input type="text"/> <i>Retailer (List Below)</i> Valencia Water Company		<i>Wholesaler (List Below)</i> Castaic Lake Water Agency												
C1	C2	C3	C4	C5*	*C6	C7	**C8	**C9	**C10	C11	Compliance Options/Alternative Conservation Approaches (1)	BMP Is Exempt (2)	BMP Implementation Requirements Met			
BMPs required for Wholesale Supplier	BMPs required for Retail Supplier	BMP Implemented by Retailers and/or Wholesalers / BMP									Not Cost Effective	Lack of Funding	CUWCC MOU Requirement Met: Retailer Yes/No	Date of BMP Report Submitted to CUWCC for (2007-2008) (MOU Signatures)	All Supporting Documents have been Submitted Yes/No	
✓	✓	BMP 1 Water Survey for Single/Multi-Family Residential Customers		Yes	X							Yes	3/30/2009	Yes		
✓	✓	BMP 2 Residential Plumbing Retrofit		Yes	X							Yes	3/30/2009	Yes		
✓	✓	BMP 3 System Water Audits, Leak Detection		Yes	X							Yes	3/30/2009	Yes		
✓	✓	BMP 3 Leak Repairs		Yes	X							Yes	3/30/2009	Yes		
✓	✓	BMP 4 Metering with Commodity Rates for All New Connections		Yes	X							Yes	3/30/2009	Yes		
✓	✓	BMP 4 Retrofit of Existing Connections		Yes	X							Yes	3/30/2009	Yes		

C1	C2	C3	C4	C5	*C6	C7	**C8	**C9	**C10	C11	C12	C13	C14	C15	C16	C17	C18
BMP Implemented by Retailers and/or Wholesalers / BMP							Compliance Options/Alternative Conservation Approaches (1)							BMP Is Exempt (2)			
BMPs required for Wholesale Supplier	BMPs required for Retail Supplier			Retailer Yes/No	Wholesaler Yes/No	Regional Yes/No	BMP Checklist	Gallons Per Capita Per Day GFCD	No Cost Effective	Lack of Funding	Lack of Legal Authority	All Supporting Documents have been Submitted Yes/No	CUWCC MOU Requirement Met	Date of BMP Report Submitted to CUWCC for (2007-2008) (MOU Signatories) (3)	Date BMP Implementation Data Submitted to DWR in CUWCC Format (Non MOU Signatures) (3)	Date BMP Implementation Data Submitted to DWR in CUWCC for (2007-2008) (MOU Signatures)	
✓	✓	BMP 5 Large Landscape Conservation Programs and Incentives	Yes	X													
✓		BMP 6 High-Efficiency Washing Machine Rebate Programs	Yes		X												
✓	✓	BMP 7 Public Information	Yes		X												
✓	✓	BMP 8 School Education	Yes		X												
		BMP 9 Conservation programs for Commercial, Industrial, and Institutional (CII) Accounts	Yes		X												
✓		BMP 10 Wholesale Agency Assistance Programs	NA		NA												
	✓	BMP 11 Conservation Pricing	Yes		X												
✓	✓	BMP 12 Conservation Coordinator	Yes		X												
✓		BMP 13 Water Waste Prohibitions	Yes		X												
	✓	BMP 14 Residential ULFT Replacement Programs	Yes				X										
	✓																

*C6: Wholesaler may also be a retailer (supplying water to end water users)

**C8, **C9, **C10: Agencies choosing an alternative conservation approach are responsible for achieving water savings equal or greater than that which they would have achieved using only BMP list.

(1) For details, please see: <http://www.cuwcc.org/mou/exhibit-1-bmp-definitions-schedules-requirements.aspx>.

(2) BMP is exempt based on cost-effectiveness, lack of funding, and lack of legal authority criteria as detailed in the CUWCC MOU

(3) Non MOU signatories must submit to DWR reports and supporting documents in the same format as CUWCC.

Valencia Water Company - CUWCC Cost Effectiveness Documentation

B/C Analysis - CUWCC Method								
Year	Units/Yr.	Retrofits Needed	Annual Water Savings (AFY)	Annual Costs (\$)	Annual Costs (\$, PV)	Cum.Costs (\$, PV)	Annual Costs of Saved Water (\$)	Costs of Saved Water (\$, PV)
2011	262	262	8	\$49,114	\$49,114	\$49,114	\$1,545	\$1,545
2012	0	241	8	\$ -	\$0	\$49,114	\$1,421	\$1,381
2013	0	222	7	\$ -	\$0	\$49,114	\$1,307	\$1,235
2014	0	204	6	\$ -	\$0	\$49,114	\$1,203	\$1,104
2015	0	188	6	\$ -	\$0	\$49,114	\$1,107	\$987
2016	0	173	5	\$ -	\$0	\$49,114	\$1,018	\$882
2017	0	159	5	\$ -	\$0	\$49,114	\$937	\$789
2018	0	146	5	\$ -	\$0	\$49,114	\$862	\$705
2019	0	134	4	\$ -	\$0	\$49,114	\$793	\$631
2020	0	124	4	\$ -	\$0	\$49,114	\$729	\$564
2021	0	114	4	\$ -	\$0	\$49,114	\$671	\$504
2022	0	105	3	\$ -	\$0	\$49,114	\$617	\$451
2023	0	96	3	\$ -	\$0	\$49,114	\$568	\$403
2024	0	89	3	\$ -	\$0	\$49,114	\$522	\$360
2025	0	82	3	\$ -	\$0	\$49,114	\$481	\$322
2026	0	75	2	\$ -	\$0	\$49,114	\$442	\$288
2027	0	69	2	\$ -	\$0	\$49,114	\$407	\$258
2028	0	63	2	\$ -	\$0	\$49,114	\$374	\$230
2029	0	58	2	\$ -	\$0	\$49,114	\$344	\$206
2030	0	54	2	\$ -	\$0	\$49,114	\$317	\$184
2031	0	49	2	\$ -	\$0	\$49,114	\$291	\$165
2032	0	45	1	\$ -	\$0	\$49,114	\$268	\$147
2033	0	42	1	\$ -	\$0	\$49,114	\$247	\$132
2034	0	38	1	\$ -	\$0	\$49,114	\$227	\$118
2035	0	35	1	\$ -	\$0	\$49,114	\$209	\$105
Total	262		90		\$49,114			\$13,694

Notes:

Benefits/C	0.3
\$/AF	\$546

DWR DMM Review Table	
Cost Effectiveness Summary	
Total Costs	\$49,114
Total Benefits	\$13,694
Benefit/Cost	0.28
Discount Rate	2.90%
Time Horizon	25 years
Cost of Water (AFY)	\$546
	90

AB 1420 Self-Certification Statement Table 2 Provide Schedule, Budget, and Finance Plan

Provide Schedule, Budget, and Finance Plan to Demonstrate Commitment to Implement All BMP's Identified in the Application Within 1st Year of Agreement for Which Applicant Receives Funds.

Self-Certification Statement: The Urban Water Supplier and its authorized representative certifies, under penalty of perjury, that all information and claims, stated in this table, regarding compliance and implementation of the BMPs, including alternative conservation approaches, are true and accurate. This signed AB 1420 Self-Certification Statement Table 1 and Table 2 are the basis for granting funds by the Funding Agency. Falsification and/or inaccuracies in AB 1420 Self Certification Statement Table 1 and Table 2, and in any supporting documents substantiating such claims may, at the discretion of the funding agency, result in loss of all State funds to the applicant. Additionally, the Funding Agency, in its sole discretion, may halt disbursement of grant or loan funds, not pay pending invoices, and/or pursue any other applicable legal remedy and refer the matter to the Attorney General's Office.

Implementation Scheduled to Commence within 1st Year of Agreement										
BMP Implemented by Retailers and/or Wholesalers			Compliance Options / Alternative Conservation Approaches (1)			BMP is Exempt (2)				
CUWCC 2010 Flex Track BMPs	BMPs required for Wholesale Supplier	Retailer BMPs	Wholesaler Yes/No	Regional Yes/No	Alternative Conservation Approaches Yes/No	BMP Checklist	Flex Track	Gallons Per Capita Per Day	Completion Level (%)	BMP Completion Date (MM/YYR)
3.30	✓	BMP 6 High-Efficiency Washing Machine Rebate Programs	Yes			X				
3.40	✓	BMP 14 Residential UL-T Replacement Programs	Yes			X				
4. Commercial, Industrial, Institutional										
4.00	✓	BMP 9 Conservation programs for Commercial, Industrial, and Institutional (CII) Accounts			Yes					
5.00	✓	BMP 5 Large Landscape Conservation Programs and Incentives			Yes					

RC6: Wholesaler may also be a retailer (supplying water to end water users)

"C9," "C10," and "C11; Agencies choosing an alternative conservation approach are responsible for achieving water

savings equal or greater than that which they would have achieved using only BMP [1st]

Savir